# ALKISTIS G. MEIMARIS, ESQ.

**MEMO ENDORSED**

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September 24, 2018

Hon. George B. Daniels
Hon. Barbara Moses
U.S. District Court
Southern District of New York
500 Pearl Street, Room 1310
New York, NY   10007

RE:   *Request to Amend Complaint in Estate of Meimaris et. al. v. Joseph E. Royce et. al. 1:18-cv-4363*

Dear Judge Daniels:

This Office represents The Estate of Alkiviades Meimaris and Helen Meimaris.  I submit this letter-motion pursuant to local Rule 7.1 (d).   I respectfully request to Amend Plaintiffs' Complaint pursuant to F.R.C.P. 15(a)(2).

Plaintiffs would like to amend their complaint to more accurately describe the roles which TBS International, Guardian Navigation, Gruposedei and Tecnisea played in the current matter and present any and all factual allegations against these Defendants. Plaintiffs realized that their original complaint and amended complaint did not accurately reflect the aforementioned Defendants' roles in this matter, nor did it accurately represent the factual allegations against these Defendants.

For these reasons, Plaintiffs respectfully request the Court to authorize Plaintiffs to Amend their Complaint.

Respectfully,

Alkistis G. Meimaris, Esq.

/s/ Alkistis Meimaris

Application DENIED. Plaintiff has now filed six versions of her pleading in two different courts. *See* Mem. Dec. & Order (Dkt. No. 58), at 1-5. On July 16, 2018, plaintiff stated that her (then proposed) Third Amended Complaint "has no fatal defects," and accused defendants of "wasting the Courts time" by suggesting that it was flawed. (Dkt. No. 50.) Consequently, plaintiff was permitted to file the Third Amended Complaint. Mem. Dec. & Order, at 7. No further amendments will be granted pending defendants' responses.

**SO ORDERED.**

Barbara Moses, United States Magistrate Judge
September 25, 2018

CC:      Counsel of Record via ECF